

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 05-57-02-JJF
	:	
WILLIE ANDERSON, JR.,	:	
	:	
Defendant.	:	

DEFENDANT ANDERSON'S MOTION FOR
RETROACTIVE COCAINE BASE SENTENCING REDUCTION

AND NOW comes the defendant, Willie Anderson, Jr., by his attorney Edson A. Bostic, Federal Public Defender, and pursuant to 18 U.S.C. § 3582 (c) (2), files this Motion for Retroactive Cocaine Base Sentencing Reduction.

In support of this motion, Mr. Anderson avers as follows:

1. By written report dated March 13, 2008, the United States Probation Office determined that defendant, Willie Anderson, Jr., qualifies for the two-level guideline reduction, and that application of the two-level reduction produces a revised guideline range of 87 to 108 months imprisonment.

2. By letter dated April 2, 2008, the United States Attorney's Office indicated that it did not oppose application of the two-level reduction, and that it took no position on the appropriate sentence within the new guideline range.

3. Defendant waives an evidentiary hearing, concurs in the Probation Officer's written findings, and requests a sentence of 87 months imprisonment.

WHEREFORE, it is respectfully requested that Defendant Anderson's Motion for Retroactive Cocaine Base Sentencing Reduction be GRANTED.

Respectfully submitted,

/s/ Edson A. Bostic

Edson A. Bostic
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